

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**IN RE:**

**PAYSON PETROLEUM 3 WELL  
2014, L.P.,**

**DEBTOR.**

**Case No. 17-40180  
Chapter 7**

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**JASON R. SEARCY, CHAPTER 11  
TRUSTEE FOR PAYSON  
PETROLEUM, INC.,**

**Plaintiff,**

**vs.**

**Adversary No. 18-04076**

**NEIL AGRAWAL, ET AL.,**

**Defendants.**

**PLAINTIFF'S NOTICE OF DISMISSAL OF DEFENDANTS  
ROSHAN BHATNAGAR; KURT E. ERICKSON; GJQ AND SLQ INVESTMENTS, LLC;  
WILLIAM NG; JAMES STEVENS; AND GERLINDE STEVENS**

Plaintiff Jason R. Searcy, Chapter 11 Trustee for Payson Petroleum, Inc. (“Plaintiff”) files his notice of dismissal of Defendants Roshan Bhatnagar; Kurt E. Erickson; GJQ and SLQ Investments, LLC; William Ng; James Stevens; and Gerlinde Stevens under Federal Rule of Civil Procedure 41(a)(1)(A)(i) made applicable by Federal Rule of Bankruptcy Procedure 7041.

1. Plaintiff is Jason R. Searcy, Chapter 11 Trustee for Payson Petroleum, Inc.
2. On September 12, 2018, Plaintiff sued 231 defendants in the above-captioned adversary proceeding, including Defendants Roshan Bhatnagar; Kurt E. Erickson; GJQ and SLQ Investments, LLC; William NG; James Stevens; and Gerlinde Stevens (“Subject Defendants”).
3. Subject Defendants have been served with process and have not served an answer

or a motion for summary judgment.

4. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.

5. A receiver has not been appointed in this case.

6. This case is not governed by any federal statute that requires a court order for dismissal of the case.

7. Plaintiff has not previously dismissed any federal- or state-court suit based on or including the same claims as those presented in this case.

8. Only Defendants Roshan Bhatnagar; Kurt E. Erickson; GJQ and SLQ Investments, LLC; William Ng; James Stevens; and Gerlinde Stevens are dismissed from the above-captioned adversary proceeding.

9. This dismissal is without prejudice.

Respectfully submitted,

**SNOW SPENCE GREEN LLP**



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*Attorneys for Jason R. Searcy,  
Trustee for Payson Petroleum, Inc.*

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on the 8<sup>th</sup> day of October 2018, a true and correct copy of the above and foregoing was served upon all parties via the Court's electronic case filing system (ECF) and by first class mail, postage prepaid to the following Defendants:

Roshan Bhatnagar  
1 S. 128 Addison Avenue  
Lombard, IL 60148

Kurt E. Erickson  
4848 E. Milton Drive  
Cave Creek, AZ 85331

GJQ and SLQ Investments, LLC  
c/o Gordon J. Quan, Registered Agent  
2 W. Terrace  
Houston, TX 77007

William Ng  
218 Wood Glen  
Oak Brook, IL 60523

James Stevens  
1609 Browns Lane  
Hayes, VA 23072

Gerlinde Stevens  
1609 Browns Lane  
Hayes, VA 23072

*/s/ Blake Hamm*  
\_\_\_\_\_  
Blake Hamm